



**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

**FILED**  
9-06-16  
04:59 PM

Application of Southern California Edison  
Company (U338E) for Approval of its Energy  
Savings Assistance and California Alternate Rates  
for Energy Programs and Budgets for Program  
Years 2015-2017.

Application 14-11-007

And Related Matters:

Application 14-11-009  
Application 14-11-010  
Application 14-11-011

**THE OPENING COMMENTS OF THE ENERGY EFFICIENCY COUNCIL (EEC) ON THE  
PROPOSED DECISION OF ADMINISTRATIVE LAW JUDGE W. ANTHONY COLBERT AND  
THE ALTERNATE PROPOSED DECISION OF COMMISSIONER SANDOVAL**

September 6, 2016

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## SUMMARY OF RECOMMENDATIONS

### Multifamily

1. Clarify ASHRAE Level I and II audits only required multifamily buildings which request and require common area measures and not ALL multifamily buildings.
2. Clarify there are two multifamily paths; a whole building approach model where building owners who meet certain criteria can receive common area measures and a separate approach for those who wish to receive services under the standard delivery method and not receive common area measures.
3. Clarify that renters can receive furnace and water heater repair and replacement measures.
4. Clarify that deed restricted properties who receive ESA funds must income qualify under the current rules of 200% Federal Poverty Guidelines (FPL).

### Dynamic Tariff/Demand Response

5. Clarify the requirement for ESA customers to enroll in a dynamic tariff or demand response program is only for those who receive central air conditioners as Commissioner Sandoval clarified in the August 31, 2016 All Party Meeting. Alternately, if it is the Commission's wish for all ESA customers to be enrolled in a dynamic tariff or demand response program, the Commission should include an opt-out provision.

### Prioritizing High Usage Customers/Go Back Rule

6. Clarify that while the Commission wishes to prioritize high usage customers for both new customers and those previously served, low-usage customers may be served concurrently with high-usage customers. It would be a very expensive endeavor if the IOUs implemented a process whereby low-usage customers could not be served at all until *every* high usage customer was served *first*.

### Energy Savings Goals/Targets

7. Clarify the energy savings targets are just that, targets. The APD appears to use the words target and goal interchangeably.

### Measures/Measure Caps

8. Clarify that all measures available for home owners are available for renters as well. This is especially important if the Commission wishes to capitalize on all available energy savings in a rental unit.

9. Clarify that it is the Commission's wish to remove measure caps. There appears to be language allowing the IOUs to add back the caps if they wish.
10. Clarify that if the Commission believes reducing costs for duct testing in the SoCalGas territory can be achieved by implementing the prescriptive duct seal approach then it makes sense to apply that standard to PG&E and SDG&E as well.

#### Budgets

11. The APD should be clear that if SDG&E and SoCalGas costs of treating a home have doubled since 2009, such increases are not due to increased measure and installation fees at the contractor level.
12. Clarify that the annual budget increases are meant to support program implementation cost increases and as such the IOUs should provide year to year cost increases to service providers.

#### Need for Expediency

13. Clarify that the budgets and new policies begin when the CARE/ESA decision is approved.

#### Cost-Effectiveness

14. Clarify that the quest for increased cost-effectiveness should not be achieved at the expense of small businesses, CBO's or Women and Minority Owned Businesses.

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**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Application of Southern California Edison Company (U338E) for Approval of its Energy Savings Assistance and California Alternate Rates for Energy Programs and Budgets for Program Years 2015-2017.

Application 14-11-007

And Related Matters:

Application 14-11-009  
Application 14-11-010  
Application 14-11-011

**THE OPENING COMMENTS OF THE ENERGY EFFICIENCY COUNCIL (EEC) ON THE PROPOSED DECISION OF ADMINISTRATIVE LAW JUDGE W. ANTHONY COLBERT AND THE ALTERNATE PROPOSED DECISION OF COMMISSIONER SANDOVAL**

Pursuant to Rule 14.3 of the Commission's Rules of Practice and Procedure, the Energy Efficiency Council (EEC) hereby submits comments on both the Proposed Decision (PD) of ALJ Colbert and the Alternate Proposed Decision (APD) of Commissioner Catherine J.K. Sandoval.

**INTRODUCTION**

It is a true statement that the PD, as written, is a jobs killer. It is also true that the Energy Savings Assistance Program (ESA) was never designed or intended to be an employment program. However, the loss in PG&E's service area of over 900 jobs and the loss of nine contractor-suppliers in the last two years should be a grave concern to this Commission. This loss represents 41% of the total work force and of those 78% were CBOs or other diverse suppliers.<sup>1</sup> The loss of jobs and contractors is one of the best indicators of the overall health of the ESA program.

The PD does not address the program's needs because it does not consider the ESA program as a whole or as a complete system. A narrow focus on policy, savings and measures, for example, is

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<sup>1</sup> EEC July 20, 2016 Presentation to the LIOB: <http://www.liob.org/160720meeting.aspx>

superfluous if the delivery part of the system (the contractor) fails. ESA is beginning to fail and has been doing so over the past two years.

In his letter withdrawing his CBO from ESA, Christopher Paige, CEO of the California Human Development Corp cited the unchanged 2001 eligibility date and measure reimbursement rates that were only viable at higher levels of production. The EEC, as representative of ESA contractors, strongly agrees with Mr. Paige's conclusions. The EEC cannot support the PD because it does not address either issue.

Over the past two years the IOUs and stakeholders have outlined, in detail, the changes necessary to continue delivering the ESA program to the low-income communities and the PD ignores those suggestions and effectively orders the IOUs to continue on the same path which is clearly a downward spiral. Because it does not address the needs to ensure a healthy contractor core or advance program policies to deliver energy savings to a larger base of customers, the PD should not be approved.

The EEC applauds Commissioner Sandoval on detailing throughout the Alternate Proposed Decision (APD) that it heard, considered and understood parties' positions on the issues that have been debated in detail over the past two years in this proceeding. The ideas put forth in the APD are innovative, bold and creative but more importantly remove many of the barriers that keep energy savings from reaching the communities that need them most. The APD accepts the input of the experts in the industry who have provided countless hours of testimony and input into this proceeding and puts forth a plan that has the best chance for success. The EEC supports the findings of the APD, however, as briefly discussed herein, the APD should be approved with the following modifications to provide additional clarity.

## DISCUSSION

### Multifamily

The APD should clarify that ASHRAE Level I and II audits are only required in multifamily buildings which request and require common area measures and not *all* multifamily buildings. There are many low-income customers living in multifamily buildings where their landlords have neither the appetite for nor the need for common area measures and as such there should be no need for a ASHRAE Level audit. We believe the APD errs by stating "[w]e require (and fund) ASHRAE Level I energy audits for all buildings participating in the multifamily component of the ESA Program and consider requiring ASHRAE Level II audits for projects that involve major capital improvements (*emphasis added*)."<sup>2</sup>

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<sup>2</sup> APD at 197

It appears the APD bundles properties receiving common area measures through a whole building approach with those multifamily buildings who wish to receive services under the standard delivery model. As such, the APD should clarify that there are two multifamily paths; a whole building approach model where building owners who meet certain criteria can receive common area measures and a separate approach for those who wish to receive historical program services and not receive common area measures. There are many apartment complexes with only a few treated units and thus would not justify common area measures.

The most glaring missing component from the APD under this new multifamily whole building approach is the approval of furnace and water heater repair and replacement measures specifically for renters. The APD should clarify that renters can receive these measures. As written, there does not appear to be any approved HVAC measures for renters within the apartment. If the Commission envisions a whole building approach, approval of in-apartment HVAC measures, including furnace and water heater repair and replacement are needed to support the common area measures. Absent this modification, the whole building approach is not a whole building approach.

Finally, the APD should clarify that deed restricted properties who receive ESA funds must income qualify under the current rules of 200% Federal Poverty Guidelines (FPL). There are many deed restricted properties whose tenants earn more than 200% of the FPL and there has been no discussion or evaluation on the record in this proceeding on whether or not ESA funds should be used to provide a benefit to any customer earning above 200% FPL.

### **Dynamic Tariff/Demand Response**

The APD should clarify the requirement for ESA customers to enroll in a dynamic tariff or demand response program is only for those who receive central air conditioners. Alternately, if it is the Commission's wish for all ESA customers to be enrolled in a dynamic tariff or demand response program, the Commission should include an opt-out provision. As it stands, the APD would create an unfair requirement for a low-income customer who deserves and otherwise qualifies for services to enroll in another program in order to receive the ESA services. It is our belief that customers would feel blackmailed into participating in the ESA program and are likely to reject services based on principle alone.

### **Prioritizing High Usage Customers/Go Back Rule**

The APD should clarify that, while the Commission wishes to prioritize high-usage customers for both new customers and those customers previously served, low-usage customers may be served concurrently. There are at least two areas where the APD appears to envision that prioritizing high-energy



users does not restrict serving low-energy users. The first is “[w]e adopt PG&E’s proposal to treat previously treated ESA Program households with all measures for which they qualify, targeting high energy use households, but not limiting eligibility for all eligible households.”<sup>3</sup> The second is “[t]his may result in a more sophisticated and targeted program with more integrated benefits, while also ensuring that all income-eligible ratepayers are given an opportunity to participate in the program, even if they are currently low energy users and their treatment would reduce their hardship and increase their health, safety, and comfort, objectives that remain important.”<sup>4</sup>

However the APD muddies this policy by adding the word “first” to the go-back discussion. The Commission further writes “[l]ow-energy using ESA-eligible households may also receive Go-Back treatment, but the directive to target high-energy using households **first** and to aim for ESA portfolio energy savings goals provides incentives to dissuade treatment that yields little in reducing energy burden and energy bills.”<sup>5</sup> While we support the vision of prioritizing high-usage customers, the addition of the word “first” may create a situation where the IOUs require ALL high-usage customers to be served BEFORE a low-usage customer can be served and we hope this is not the Commission’s intent. Just as the Commission envisions a situation where high-usage customers may be delayed in receiving services because a low-usage customer is being served, the Commission should not create a situation where low-usage customers are required to wait months or even years to be served.

Further, the APD incorrectly asserts that a prioritization of homes minimizes administrative expenses by efficiently using contractor time and labor.<sup>6</sup> This would be true if every customer was waiting in line to be served but unfortunately they are not. The list is a random mix of customers derived from contractor marketing efforts, IOU marketing efforts, customer referrals and several other sources which all come together to create the list of customers to serve. We are not suggesting a priority order will fail, we are suggesting a “treat first” requirement would be detrimental to the program.

The APD further rationalizes that the cost savings from minimizing contractor “truck rolls” is less than the additional cost of the CARE subsidy and that “it is unreasonable to not go back and prevent additional treatments to get a customer’s energy usage below 400%”.<sup>7</sup> While these statements are correct, forcing a “treat first order” as the **only** means for delivering services would cause contractor trucks to be sitting around waiting for a high-usage customer to either request service or reject service before another customer can be served. This would cost the program more, not less.

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<sup>3</sup> APD at 61

<sup>4</sup> APD at 47

<sup>5</sup> APD at 62/63

<sup>6</sup> APD at 64

<sup>7</sup> APD at 63

The IOUs already have policy whereby customers who request service must be served within 30 days of the request. Therefore, the example used in the APD about a high-usage customer waiting to be served would never occur and, as such, the Commission should not implement a policy that requires high-usage customers to be served at the expense of low-usage customers. It would be a very expensive endeavor if the IOUs implemented a process whereby low-usage customers could not be served at all until *every* high usage customer was served *first*.

### **Energy Savings Goals/Targets**

Throughout its discussion and findings, the APD uses the words “target” and “goal” - often interchangeably. The overall result is some confusion on the APD’s exact meaning. The word “target” refers to a direction or focus of an effort or action, while “goal” adds measurability to the pursuit of the goal. Goals also require some sort of penalty or negative consequence if they are not achieved.

It is clear that the APD modifies a number of long-standing ESA program practices and procedures. EEC is concerned that the random substitution of a goal for a target could have significant negative consequences in the new program cycle. For example, if the IOUs are required to achieve a hard energy savings goal, they may implement policies and procedures that impede the delivery of services to low-energy users as opposed to high-energy users. However, if the objective is a target, the IOUs are more likely work toward that end providing services to all customers who qualify. As Commissioner Sandoval indicated at the All Party Meeting on August 31, 2016, California needs energy savings and we should get them anywhere we can.

The implementation of targets rather than goals will allow program administrators the flexibility to modify procedures as needed that will result in an end product that is much more aligned with the spirit and intention of the APD. For this reason, EEC recommends that the APD use a target instead of a hard goal.

### **Measures/Measure Caps**

The APD should clarify that all measures available for homeowners, including water heater and furnace repair and replacement, are available for renters as well. This is especially important if the Commission wishes to capitalize on all available energy savings inside a rental unit. We are unable to find any language in the APD that indicates which measures should be available to renters.

Additionally, the APD adds language regarding measure caps that is confusing and ambiguous. The Commission writes “[t]he utilities shall not install more measures than are needed to reduce energy hardships, and meet the health, safety, and comfort needs of ESA clients as indicated by the LINA study

*and this Decision.*”<sup>8</sup> It is unclear what is meant by this statement. On one hand the Commission is requiring the removal of measure caps and on the other giving the IOUs the ability to add them back. The EEC supports the removal of measure caps and suggests the Commission clarify its intent.

Regarding the APD’s requirement for SoCalGas to move to a prescriptive duct seal approach, the Commission reasons it is moving in this direction to reduce measure costs by removing costs associated with the duct test.<sup>9</sup> Because SDG&E and PG&E have this same measure with the same measure cost concerns, the APD errs by not applying this change to all IOUs. This is certainly a case where if it makes sense for SoCalGas, it makes sense for the other IOUs.

## **Budgets**

Regarding cost increases the APD writes “*However, for some of the IOUs, the total cost to treat a household has more than doubled since 2009 (specifically SDG&E and SoCalGas). When we look further at the specific areas of increase we see that for the most part, the trend is in the increase in measure and installation costs per household treated, with some exceptions.*”<sup>10</sup> While it is not clear how the Commission arrived at this conclusion, as contractor representatives, we can attest unequivocally that such increases are **not** due to increased measure and installation **fees** at the contractor level. Contractor measure and installation reimbursement **fees** have absolutely not doubled since 2009; not even close. The Commission should not leave readers with this incorrect impression.

## **Need for Expediency**

According to Decision 16-06-018, “[b]ridge Funding for the 2015-2017 Energy Savings Assistance Program and California Alternate Rates for Energy Program, and Cool Center Program shall expire upon on the issuance of the final decision in the instant Application (A.) 14-11-007, A.14-11-009, A.14 11 010, and A.14-11-011”.<sup>11</sup> The APD should clarify that not only do the budgets approved in this decision begin upon issuance but the new policies begin when the decision is approved as well.

## **Cost-Effectiveness**

The APD seeks greater cost-effectiveness as the program moves forward. While we support this effort, the APD should clarify that the quest for increased cost-effectiveness should not be achieved at the expense of small businesses, CBO’s or Women and Minority Owned Businesses. At some point, service

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<sup>8</sup> APD at 116

<sup>9</sup> APD at 104

<sup>10</sup> APD at 35

<sup>11</sup> Decision 16-06-018: Interim Decision Adopting Bridge Funding from July 1, 2016 to December 31, 2016 for the large Investor-owned Utilities’ Energy Savings Assistance and California Alternate Rates for Energy Programs, OP 3.

delivery will be optimized and measures will still be required. Allowing the IOUs to force down measure reimbursement fees (or not raising them as costs rise) simply for the sake of cost-effectiveness should not be allowed. In essence, it places contractors in the unjust position of having to subsidize the program in order to ensure its effectiveness.

## **CONCLUSION**

Contractors and service providers are very much an integral part of the ESA program. Just as the Commission has the responsibility to ensure the program cost-effectively delivers energy savings to low-income households, it has the responsibility to ensure a healthy contractor core. ESA's ability to enroll and later serve hard to reach customers would be severely handicapped by the continued loss of the CBOs, minority contractors and employees who live in the communities they serve. These groups are not only well-trained in ESA's policy and procedures, they are well versed in the communities' norms as well as the language and customs of those they serve.

The Commission must also share its responsibility for the program contractors with the utilities. Even a well-designed ESA program from the Commission will fail if the utilities do not consider the costs and impact of their administrative, marketing and pricing decisions on small, diverse and CBO suppliers.

The APD takes immediate steps to address the barriers that have been hampering the ESA program for years and for those reasons should be approved with the modifications listed herein.

Respectfully submitted,

September 6, 2016

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## **APPENDICIES:**

A: PROPOSED MODIFICATIONS TO THE BODY OF THE APD

B: PROPOSED MODIFICATIONS TO THE FINDINGS OF FACT IN THE APD

C: PROPOSED MODIFICATIONS TO THE CONCLUSIONS OF LAW IN THE APD

D: PROPOSED MODIFICATIONS OF ORDERING PARAGRAPHS OF THE APD

## APPENDIX A: Proposed Modifications to the Body of the APD

### At page 35:

However, for some of the IOUs, the total cost to treat a household has more than doubled since 2009 (specifically SDG&E and SoCalGas). ~~When we look further at the specific areas of increase we see that for the most part, the trend is in the increase in measure and installation costs per household treated, with some exceptions.~~

There are also areas where budgets need to conform because of various changes, initiatives directed, and timing of this decision. We direct each utility to file Tier 2 Advice Letters within 60 days of this Decision to conform final program energy savings goals and budgets to the directives herein. The Advice Letter should include program costs for approved measures, penetration goals, cost effectiveness values, and any other updated factors. The Advice Letter should include budget numbers for 2018-2020 based on the 2017 approved budget with up to a ~~2%~~ 3% upward adjustment for each year after 2017 **which is meant to support increased costs for service providers.**

### At page 62/63

Low-energy using ESA-eligible households may also receive Go-Back treatment, but the directive to target high-energy using households ~~first~~ and to aim for ESA portfolio energy savings goals provides incentives to dissuade treatment that yields little in reducing energy burden and energy bills.

### At page 116:

~~The utilities shall not install more measures than are needed to reduce energy hardships, and meet the health, safety, and comfort needs of ESA clients as indicated by the LINA study and this Decision.~~

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## APPENDIX B: Proposed Modifications to the Findings of Fact in the APD

12. The Commission is generally supportive of the creation and adoption of an energy savings ~~goal~~**target** for the ESA Program **that does not limit services to low-energy users**.

13. It is reasonable to adopt an energy savings ~~goal~~**target** for the ESA Program for this cycle based on prior accomplishments of low income energy savings from the ESA Program and informed by the low income section of the Energy Efficiency Potential and Goals Study for 2015 and Beyond.

26. It is reasonable to direct SoCalGas, **PG&E, SDG&E and SCE** to adopt a prescriptive duct sealing approach.

49. It is reasonable to use ESA Program fund for the subset of multifamily buildings dedicated to providing affordable housing to low-income Californians **whose income is at or below 200% of the FPL**, including deed restricted, government and non-profit owned multifamily buildings, including common areas.

**NEW FAF: Failure to provide renters heaters and water heaters may undermine the effectiveness of treatment of common area measures.**

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## APPENDIX C: Proposed Modifications to the Conclusions of Law in the APD

24. SoCalGas, **PG&E, SDG&E and SCE** should adopt SDG&E's Prescriptive Duct Sealing approach.

36. The HISR requirements should not be changed **however the IOUs should implement a 90 day temporary badge policy where contractor employees have passed a formal background check as they are in place to ensure the safety of our ESA Program participants and should not be bypassed.**

37. The IOUs should put forth proposals to remove any of the existing caps on physically installed units ~~for relatively low-cost measures~~ and also identify any related budget impacts.

60. Toilet age and gallon per flush data should be collected, **when possible**, for all toilets in a participating household and shared with CSD for follow up and potential toilet replacement under the CSD/DWR campaign; the number of toilets assessed should not be capped.

68. Contractors responsible for delivering energy education should **offer to** enroll all ESA Program customers with an active e-mail address and home/mobile internet access into the My Energy/My Account platforms, and should educate customers on the website offerings using the customer's device of choice.

72. The IOUs should conduct outreach to multifamily properties that are listed on the State Treasurer's website **whose tenants have incomes at or below 200% FPL.**

86. Full funding for common area measures should occur for Government/non-profit/or deed restricted low-income multifamily housing **whose tenants have incomes at or below 200% FPL.**

104. New ESA Program measures, pilots, or other initiatives **designed to achieve energy benefits** should be approved if the proposals are found to be both cost effective and compliant with any other applicable directives outlined in this Decision.

125. The IOUs should ~~treat ESA~~ focus on and track categories of households treated including, but not limited to: Households that have never received ESA treatment; Households that have received ESA treatment since 2002, tracking the measures installed and noting the condition and functionality of the previously installed ESA measures; Focus on high energy-using households, including, but not limited to those who often use 300% of monthly energy baseline quantity or more; Focus on customers with disabilities, or other demonstrated safety and health needs, as well as comfort needs as identified in the LINA study and this Decision; Focus on water/energy nexus measures including replacement of Evaporative Coolers with High Efficiency air conditioners to increase energy reliability in light of the drought and amount of water and embedded energy in water necessary to run evaporative coolers; Focus on multifamily households and buildings, particularly where treatment to the multifamily common area would result in significant energy efficiency savings; For SCE and SoCal Gas, focus on the areas affected by the Aliso Canyon State of Emergency, as the geographic area may be adjusted by the Commission's Energy Division. **The focus listed above should not exclude any low-income customer from participating in ESA at any time.**

~~126. A household should not be considered treated, and the energy savings from the home should not be counted towards the energy savings portfolio target, until the customer is enrolled either in a dynamic tariff or in a demand response program. The utility should develop appropriate reporting templates, in~~



~~consultation with the Commission's Energy Division, to track program participation by household. If a customer is already enrolled in a dynamic tariff or in a demand response program, such enrollment should count and allow the household to be considered as "treated" for the purposes of this requirement. Customers on medical baseline should be exempted from this requirement.~~

166. ESA Program enrollment **is encouraged but** should not be necessary **a requirement** for customers whose usage is below 400% of baseline.

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## **APPENDIX D: Proposed Modifications of Ordering Paragraphs of the APD**

5. Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company and Southern California Gas Company shall ~~require~~ **encourage** enrollment in either a demand response program or in a dynamic tariff ~~in order to~~ **during enrollment of** a customer in ~~an~~ **the** Energy Savings Assistance Program. ~~The energy savings shall not count and the household shall not be considered treatment without enrollment in either the demand response or dynamic tariff programs. Customers on medical baseline are exempted from this requirement.~~

15. Southern California Gas Company (SoCalGas) shall adopt San Diego Gas & Electric Company's Prescriptive Duct Sealing approach, which maintains duct sealing as a measure but reduces costs associated with duct testing. **Pacific Gas and Electric Company, Southern California Edison Company, Southern California Gas Company and San Diego Gas & Electric Company shall also implement the Prescriptive Duct Sealing approach as well.**

39. Pacific Gas and Electric Company, Southern California Edison Company, **Southern California Gas Company** and San Diego Gas & Electric Company shall fund in the Energy Savings Assistance Program common area measures for the subset of multi-family buildings dedicated to providing affordable housing to low-income Californians **at or below 200% of the FPL**, including deed restricted, government and non-profit owned multi-family buildings.

40. Pacific Gas and Electric Company, Southern California Edison Company, **Southern California Gas Company** and San Diego Gas & Electric Company shall fund from the Energy Savings Assistance Program common area measures for multi-family buildings that has 80% verified low-income tenants **at or below 200% of the FPL**, with funding up to 80% of total measure costs.

41. Pacific Gas and Electric Company, Southern California Edison Company, **Southern California Gas Company** and San Diego Gas & Electric Company shall provide renters residing in multifamily properties with information and pre-paid postage that they can pass on to their landlords on behalf of the Energy Savings Assistance Program.

42. Pacific Gas and Electric Company, Southern California Edison Company, **Southern California Gas Company** and San Diego Gas & Electric Company shall use the Single Point of Contact model for all multi-family buildings as described in this decision.

**NEW OP. Pacific Gas and Electric Company, Southern California Edison Company, Southern California Gas Company and San Diego Gas & Electric Company shall provide renters with the same measures provided to owners under the ESA Program Guidelines.**

109. Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company (large electric Investor-Owned Utilities) shall use the discretion set forth in Decision 14-08-030 in regard to setting a monthly referral ceiling to address and deal with the pacing of program implementation and delivery in regard to customers who have usage at or above the 90th percentile of amongst those not subject to the current High Usage Post Enrollment Verification process, have also been on the California Alternate Rates for Energy (CARE) Program rate at the same meter for at least six years, and have not participated in the Energy Savings Assistance (ESA) Program at their current meter location. The large electric Investor-Owned Utilities must ~~first~~ target CARE Program customers with the highest usage and longest tenancy on the CARE Program and prioritize their outreach and mandatory enrollment into the ESA Program. Priority shall also be given to customers affected **ed** by the natural gas outage at Aliso Canyon.